

**From:** [Tran, Frank](#)  
**To:** [kimberly.kuhls@bakerhuges.com](mailto:kimberly.kuhls@bakerhuges.com)  
**Subject:** Request for additional information for NRC License No. SNM-1826  
**Date:** Monday, June 15, 2020 3:20:00 PM

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Dear Ms. Kuhls:

We have reviewed the amendment request dated May 5, 2020 from Reuter-Stokes, LLC for NRC License No. SNM-1826. We determined that we will need the following to complete our review.

You request to add the following to License Condition No. 13: "Licensee need not perform a leak test on the following sources: Sources containing 3.7 MBq (100 microcuries) or less of beta- or gamma-emitting material or 0.37 MBq (10 microcuries) or less of alpha-emitting material." Currently, there is a NRC standard condition which states that "Sealed sources need not be tested if they contain only hydrogen-3; or they contain only a radioactive gas; or the half-life of the isotope is 30 days or less; or they contain not more than 100 microcuries of beta- and/or gamma-emitting material or not more than 10 microcuries of alpha-emitting material." This condition is usually permitted in the NRC license that is authorized for the sealed sources identified above which the licensee acquired from other authorized persons. These sources can originally be permitted by a general license, exempt license, specific license, etc. (see 10 CFR 31.5(b)(1) and 31.59(c) for references).

For a sealed source/device which the licensee introduced a quantity of 100 microcuries or less of beta- and/or gamma-emitting material or 10 microcuries or less of alpha-emitting material radioactive material into it in accordance with 10 CFR part 32, the licensee must ensure that its loose surface contamination is less than 185 becquerels (0.005 microcuries) before it is transferred to other authorized person, except as permitted by Subpart K to 10 CFR part 20.

Please confirm that a) the licensee will verify for loose surface contamination for sealed sources containing not more than 100 microcuries of beta- and/or gamma-emitting material or not more than 10 microcuries of alpha-emitting material which were manufactured by the licensee before transferring to other authorized persons, b) the licensee will not transfer a sealed source to other authorized person if the test reveals the presence of 185 becquerels (0.005 microcuries) or more of removable contamination, except as permitted by Subpart K to 10 CFR part 20, and c) the last record of test results will be maintained for 3 years after the source was transferred.

Please provide the response in writing with an authorized signature and date by July 13, 2020. To facilitate proper correspondences handling in our office, please reference Mail Control No. 618846 in your response. If you have any questions or require clarification on any of the information stated above, please do not hesitate to contact me at 630-829-9623 or reply to this email.

Best regards,

*Frank Tran*

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